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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 **HEATHER SCHOENWALD, an**
10 **individual; TOM KOCH, an individual;**
11 **Plaintiffs,**

12 **v.**

13 **UNUM GROUP, a Foreign Corporation;**
COLONIAL LIFE & ACCIDENT
14 **INSURANCE COMPANY, A**
15 **SUBSIDIARY OF UNUM GROUP, a**
16 **Foreign Corporation; DOES 1 through**
10; ROE CORPORATIONS, 1 through
10, Defendants

Case No.: 2:20-CV-01948-JCM-BNW

**STIPULATION AND ORDER
FOR EXTENSION OF TIME
FOR PLAINTIFF
SCHOENWALD’S RESPONSE
TO DEFENDANTS’ PARTIAL
DISMISSAL OF PLAINTIFFS’
AMENDED COMPLAINT AND
DEFENDANTS’ REPLY
DEADLINES**

(Second Request)

17 Plaintiff Heather Schoenwald (“Schoenwald”), Plaintiff Tom Koch
18 (“Koch”) (collectively, “Plaintiffs”), Defendant UNUM Group (“UNUM”), and
19 Defendant Colonial Life & Accident Insurance Company (“Colonial Life”), by
20 and through their respective counsel of record, hereby request and stipulate to
21 extend the time for Plaintiff Schoenwald to respond to Defendants’ Motion for
22 Partial Dismissal of Plaintiffs’ Amended Complaint (Doc. No. 26).¹ Plaintiff

23 _____
24 ¹ Defendants did not move to dismiss Plaintiff Koch’s single claim for retaliation.

1 Schoenwald's Response is currently due March 23, 2021, and the parties have
2 agreed to extend the time up to and including March 26, 2021. The parties also
3 agree to extend the deadline for Defendants to file their Reply up to and
4 including April 16, 2021. This is the parties second request for an extension of
5 time for Plaintiff Schoenwald to Respond to Defendants' Motion for partial
6 Dismissal and for Defendants to submit a Reply Brief. Plaintiff Schoenwald and
7 Defendant are currently discussing resolving several of Plaintiff Schoenwald's
8 claims that, if resolved, would potentially render Defendants' Motion moot and
9 allow for same to be withdrawn; however, they have agreed to the extension on
10 the briefing schedule should they not be able to resolve those claims.

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Case No.:2:20-CV-01948-JCM-BNW

This Stipulation and Proposed Order for Extension of Time is made in good faith and is not intended for purposes of delay.

DATED this 23rd day of March, 2021. DATED this 23rd day of March, 2021.

CLAGGETT & SYKES LAW FIRM

LAGOMARSINO LAW

/s/ Joseph Mott

/s/ Andre Lagomarsino

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DATED this 23rd day of March, 2021.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

/s/ Dana Salmonson

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ORDER

IT IS HEREBY ORDERED that the Parties' Stipulation for Extension of Time Regarding Defendants' Motion for Partial Dismissal of Plaintiffs' Amended Complaint is **GRANTED**.



U.S. DISTRICT JUDGE

DATED: March 24, 2021
